

# Exhibit G

Robinson, Simon J. (Hunleigh) 2/22/2007 4:02:00 PM

HIGHLY CONFIDENTIAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION

No. 21 MC 97 (AKH)

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VIDEOTAPED DEPOSITION OF  
SIMON J. ROBINSON

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Thursday, February 22, 2007

REPORTED BY: SHERRI STARR, CSR# 10245 (03-392094)

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1 A. I do not.

2 Q. Do you know of any security reason why a  
3 three-inch Swiss Army knife would not be able to do  
4 the same damage as a box cutter?

5 MR. TOMASIK: Objection.

6 THE WITNESS: I do not.

7 MR. ROSS: Q. Can you give us any  
8 security reason why the FAA made these distinctions  
9 with regards to knives and sharp instruments as to  
10 why some were allowed through and others were not?

11 MR. SCHOLZ: Objection to form, legal  
12 conclusion.

13 THE WITNESS: I do not know of any reasons  
14 as to why that determination was made on blade size  
15 or distinction of knife type.

16 MR. ROSS: Q. Okay. Let's talk about  
17 inside the sterile area for a second. You're  
18 familiar with the sterile area on the other side of  
19 the checkpoint that you ran in Boston up until  
20 August of 2001, right sir?

21 A. That is correct.

22 Q. And let's talk about it as of that time,  
23 not as of now. Are you aware of any places where  
24 somebody who had passed through the checkpoint could  
25 then obtain a knife --

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1 MR. SCHOLZ: Objection.

2 MR. ROSS: -- inside the sterile area?

3 THE WITNESS: I believe that there's a

4 number of places that they could have obtained one.

5 I do not believe they could have gotten one from

6 Burger King but I do believe that they could have

7 gotten one from the Red Carpet Club that provides a

8 similar type of service as this room does with

9 cutlery, crockery, stuff like that to serve its

10 first-class passengers and business club members.

11 It's a possibility, yes.

12 MR. ROSS: Q. Okay. That's one place,

13 you said there were a number of places. What other

14 places might someone, a terrorist or otherwise, have

15 been able to obtain a knife?

16 A. There was one situation, and I do believe

17 there was another bar and restaurant on the

18 right-hand side of the terminal. I can't remember

19 because the terminal has changed a lot over the

20 years since then.

21 It was actually under construction while I

22 was there and that brings me to my other case in

23 point that there's a possibility that workmen that

24 worked in the area rebuilding that concourse had

25 tools available to them that could have been

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1 obtained by a passenger. I can recall several times  
2 when they were re-installing the wall and ceiling to  
3 one of the terminals that tools were all over the  
4 place in that particular area being used to help  
5 with the construction of that area.

6 MR. ROSS: Q. Was the restaurant that you  
7 just mentioned, was that completed by the time you  
8 left in August of 2001?

9 A. That's the one I don't remember much  
10 about. I believe it was on the right-hand side.  
11 There was a Hudson News magazine and gift store on  
12 the left-hand side. This, as I remember rightly, I  
13 think this bar/sandwich-type setup was on the  
14 right-hand side of the terminal but I could be  
15 wrong, that's one I'm not clear on.

16 Q. So you're not clear on whether the  
17 restaurant was completed prior to your leaving or  
18 not?

19 A. Correct.

20 Q. Okay. Have you ever eaten in the  
21 restaurant?

22 A. Yeah.

23 Q. Were knives available in the restaurant  
24 when you were there?

25 MR. SCHOLZ: Objection.